

November 6, 2018

The Honorable Jocelyn G. Boyd
 Chief Clerk/Administrator
 The Public Service Commission of South Carolina
 101 Executive Center Dr., Ste. 100
 Columbia, SC 29210

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RE: DOCKETS: 2018-321-E and 2018-322-E

Dear Ms. Boyd,

On behalf of the Southeast Energy Efficiency Alliance (SEEA), we ask that you file this letter for **Dockets 2018-321-E and 2018-322-E** in which we express our strong support for Duke Energy Progress and Duke Energy Carolinas proposed electric transportation pilots and requests to defer related capital and operating expenses to expand their electric vehicle investments. SEEA is a 501(c)(3) organization that promotes energy efficiency for a cleaner environment, a more prosperous economy, and a higher quality of life in the southeastern region of the United States. Energy efficient transportation is a critical element to achieving those goals.

We believe that these programs will provide customer services to South Carolinians and those traveling through Duke Energy's territories to improve driver confidence and enhance the company's service offerings. Not only will drivers and Duke Energy customers benefit, but these programs will help the company keep pace with the increasing demand for the expansion of transportation electrification, for individual consumers, businesses and fleets.

We believe that all four of the pilot programs are well designed, modest in scope and size, and constitute a good first step toward meeting the large infrastructure gap in South Carolina and southeastern states between the expected introduction of electric vehicles (EVs) over the next five to ten years, and the lack of plans for deployment of adequate EV infrastructure, which serve the public. We believe the total expected expenditures for these two programs (including both O&M and capital) are relatively modest as pilot programs, and should be approved, with DE Carolinas at \$7.11 million and DE Progress at \$3.32 million. For residential customers, Duke intends to offer a rebate to customers who wish to install EVSE at their homes, but will also collect the vital charging data on the location, time, voltage, and other information important for the reliable operation of the distribution grid. During this pilot phase, it is important to both monitor the changes in consumer behavior regarding the time at which they charge for the benefit of the EV owners, but also provide Duke, as the grid operator, the necessary information to manage these increased loads and enhance efficient utilization of the distribution assets.

In addition, we support the plans of Duke to deploy 30 DC fast charging stations throughout the state, primarily on highway corridors. We believe it is important for a utility, like Duke, to adopt a portfolio approach of charging infrastructure to test and assess how EV owners and consumers will actually use it, and to be able to spread the costs out in aggregate among these different assets over time. Most consumer surveys of potential surveys have shown that range anxiety is the major impediment to great adoption and purchase of EVs. Simply put, consumers may realize that most of the charging will be done at home (or the workplace if they have that benefit through their employers and spaces are available), but they are anxious about running out of battery power, leaving them stranded on the side of the highway. Duke's relatively modest proposal with appropriately-sited DC fast charging stations throughout the state should be able to test that concern, and address range anxiety.

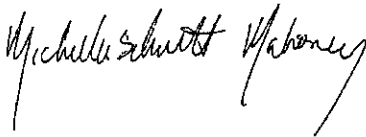
Moreover, heavy-duty fleets are significant contributors of harmful diesel emissions. Transitioning to electric options will reduce these emissions and lower costs for these fleets. However, a reliable charging network will be critical to support adoption of this technology and ensure these benefits are realized. By working with the transit agencies to identify and support charging needs of buses through the program, Duke Energy will be able to more reliably and cost-effectively fulfill their service needs. Further, this program will provide benefits to help reduce customer's overall energy costs and, when managed effectively, create "downward pressure on utility customer rates"¹ over the long term.

This is well-designed program that we believe will be a valuable step in increasing transportation electrification and providing benefits to customers, the company and the state. Please let us know how SEEA can assist the Commission in its consideration of these programs, and we, of course, will participate in any proceeding or workshop that the Commission may wish to establish to gather more information.

If you have any questions or need any support, please feel free to contact me at ablair@sealliance.org.
Sincerely,



Anne Blair
Director, Energy Efficient Transportation



Mandy Mahoney
Executive Director

¹Duke Energy Progress, LLC. *Application for approval of proposed electric transportation pilot and an accounting order to Defer Capital and Operating Expenses*. P. 2.